

**Federal Defenders
OF NEW YORK, INC.**

David E. Patton
*Executive Director
and Attorney-in-Chief*

BY ECF & EMAIL

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

The status conference for Defendant Jonathan Rivera
scheduled for June 27, 2023 is adjourned to August 23,
2023 at 11:00 a.m. in Courtroom 520.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
June 20, 2023

Re: *United States v. Jonathan Rivera, S1 23-cr-76-2 (PMH)*

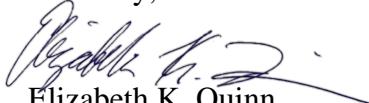
Dear Honorable Judge Halpern:

I am writing to request an adjournment of status conference scheduled for June 27, 2023, at 12:15 p.m. for a date in August 2023.

As the government noted in its letter dated May 16, 2023, the parties have been actively involved in plea negotiations. I submitted a mitigation submission on Mr. Rivera's behalf on March 10, 2023. I supplemented that filing in early May 2023. It is my understanding that the government is still considering that submission and supplement and the parties therefore require additional time to reach a disposition. We are requesting a date in August 2023 for a status conference. I do not object to the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) as the ends of justice served by taking this action outweigh the best interest of the public and Mr. Rivera in a speedy trial, as it would permit the parties to continue discussion and reach a resolution in this matter. Further, it is respectfully submitted that the failure to grant this request would deny the parties reasonable time needed for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

I have conferred with the government, through Assistant United States Attorney Stephanie Simon, regarding this request and there is no objection to an adjournment. For planning purposes, I will be away in August from August 17, 2023, through August 21, 2023, and Ms. Simon will be away from of August 25, 2023, until the end of the month. My hope was to find a date convenient for the Court and the parties. Thank you for your time and consideration.

Sincerely,



Elizabeth K. Quinn
Assistant Federal Defender
Counsel for Jonathan Rivera

cc: Stephanie Simon, AUSA